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Attorneys for Relief Defendant ACCELERATION
CAPITAL PARTNERS

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

KING CHUEN TANG a/k/a CHEN TANG,
RONALD YEE, ZISEN YU, JOSEPH SETO, MING
SIU, KING S. TANG a/k/a JAMES K. TANG, and
YING KIT YU a/k/a EDDIE YU,

Defendants,

and

VENTURE ASSOCIATES FUND I, TANG
CAPITAL PARTNERS, ACCELERATION
CAPITAL PARTNERS, AMERICAN PEGASUS
LONG SHORT FUND SEGREGATED
PORTFOLIO, PING LEE TANG, KA LING LEE,
YIN LEE KA, CHEUNG-TING KA, SYLVIA TSUI,
DOI PING SIU, YUEN-LAI MA, LEUNG-KEE SIU,
ROSALIE CHO, and MINOR CHILD I and MINOR
CHILD II, minor children of Defendant King Chuen
Tang a/k/a Chen Tang,

Relief Defendants.

Case No.: CV 09 5146 JCS

**STIPULATION AND
[PROPOSED] ORDER
REGARDING THE TRANSFER
OF FUNDS FROM RELIEF
DEFENDANT ACCELERATION
CAPITAL PARTNERS FOR
PURPOSE OF COMPLYING
WITH COURT ORDERED
ACCOUNTING**

WHEREAS, on April 26, 2010, the Court ordered the relief defendants in the above-captioned action (the "Action") to produce an accounting of the receipt, use, and disposition of all alleged insider trading profits by July 22, 2010 (the "Court Order");

WHEREAS, Fenwick and West LLP ("Fenwick") is counsel for relief defendant Acceleration Capital Partners ("ACP") in the Action;

WHEREAS, Fenwick has met and conferred with counsel for the Securities and Exchange Commission (the "SEC") regarding ACP's payment for services rendered on behalf of ACP; and

WHEREAS, the SEC has agreed that it will not take the position that the use of ACP funds to pay for work performed on behalf of ACP in this Action is illegal or improper;

IT IS ACCORDINGLY STIPULATED, by and between undersigned counsel for the parties, that: (1) ACP may transfer funds directly from the ACP account to pay for legal services provided to ACP in connection with this Action; and (2) the SEC will not take position that such transfers are illegal or improper.

ATTESTATION

Concurrence in the filing of this document has been obtained from the other signatory.

Dated: May 19, 2010

SECURITIES AND EXCHANGE COMMISSION

By: /s/ Jennifer D. Brandt
Jennifer D. Brandt

Attorneys for Plaintiff SECURITIES AND
EXCHANGE COMMISSION

Dated: May 19, 2010

FENWICK & WEST LLP


By: /s/ Jay L. Pomerantz

Jay L. Pomerantz
Attorneys for Relief Defendant ACCELERATION
CAPITAL PARTNERS

1 IT IS SO ORDERED.

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3 Dated: May 20, 2010

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HONORABLE JUDGE JOSEPH C. SPERO
United States District Court Magistrate Judge

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FENWICK & WEST LLP
ATTORNEYS AT LAW
MOUNTAIN VIEW